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January 11, 2022

BY ECF

Hon. Ronnie Abrams United States District Judge 40 Foley Square New York, New York 10007

Re: United States v. Bahadorifar, et al., 21 CR 430 (RA)

Dear Judge Abrams:

I am writing on behalf of defendant Niloufar Bahadorifar to respectfully request a three week adjournment of the January 13, 2022 status conference in this case to provide the defense with an opportunity to continue reviewing the voluminous discovery prior to setting a pretrial motion schedule. The government, by AUSA Jacob Gutwillig, has no objection to this request and the defendant agrees to exclude speedy trial time until the date of the next scheduled conference.

Thank you for the Court's consideration on this application; I remain available for a teleconference should Your Honor deem it necessary.

Respectfully submitted,

Jeffrey Lichtman

cc: All counsel (by ECF)